



# Oregon

John A. Kitzhaber, MD, Governor

## Department of Environmental Quality

Northwest Region Portland Office

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February 13, 2014

*Also Sent Via E-mail*

Mr. Robert J. Wyatt  
NW Natural  
220 N.W. Second Avenue  
Portland, OR 97209

**Re: Revised Hydraulic Source Control and Containment System Groundwater Model  
Update Report  
NW Natural "Gasco Site" and Siltronic Corporation Facility  
Portland, Oregon  
ECSI Nos. 84 and 183**

Dear Mr. Wyatt:

The Department of Environmental Quality (DEQ) reviewed the "Revised Hydraulic Source Control and Containment System Groundwater Model Update Report, NW Natural Gasco Site" dated October 2013 (Revised Model Update Report). DEQ downloaded a soft copy of the document for review on October 10, 2013. Anchor QEA, LLC (Anchor) prepared the Revised Model Update Report on behalf of NW Natural.

The Revised Model Update Report responds to DEQ's comments on the Draft Model Update Report<sup>1</sup> which were provided by e-mail on August 12, 2013. DEQ's August 12<sup>th</sup> comments were further discussed during a workshop on August 15, 2013 that was arranged in part to discuss the Draft Model Update Report.

The primary purpose of this letter is to inform NW Natural that the Revised Model Update Report does not address many of DEQ's previous comments and requests for information. DEQ continues to request that all aspects of model development, including the assumptions used to develop the model and the associated limitations, be fully documented. For clarification, DEQ requests that NW Natural:

- Document all hydraulic parameters selected for use in the model (e.g., horizontal and vertical hydraulic conductivity values, storage values), including tables and figures and the source(s) of the information; and
- Identify and discuss the underlying assumptions and limitations associated with all aspects of the model input parameters.

DEQ considers it important to fully document model input parameters such as hydraulic conductivity, so there are shared understandings of model construction going forward. Furthermore, identification and documentation of the assumptions used to develop the model,

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<sup>1</sup> Anchor QEA, LLC, "Hydraulic Source Control and Containment System Groundwater Model Update Report - NW Natural Gasco Site," dated July 2013 (received via e-mail on July 29, 2013), a report prepared for NW Natural.

Bob Wyatt  
NW Natural  
February 13, 2014  
Page 2 of 2

including the potential limitations of those assumptions, provide a basis for making future adjustments to the model.

DEQ comments on the Revised Model Update Report are attached. In addition to DEQ, the U.S. Environmental Protection Agency (EPA) reviewed the document. The DEQ and EPA comment sets are attached as Attachment 1 and Attachment 2 respectively. The attachments provide additional details regarding the information needed to complete the report.

DEQ requests that NW Natural revise and resubmit Model Update Report consistent with the attached comments on or before March 17, 2014. As soon as practicable after NW Natural receives this letter, DEQ recommends meeting to discuss the attached comments. DEQ believes a meeting will facilitate completion of the Model Update Report.

Please contact me with questions regarding this letter or the attachments.

Sincerely,

Dana Bayuk  
Project Manager  
Northwest Region Cleanup Section

Attachments: DEQ Comments  
EPA Comments

Cc: Myron Burr, Siltronic Corporation  
Patty Dost, Pearl Legal Group  
Alan Gladstone, Davis Rothwell Earle and Xochihua  
John Edwards, Anchor  
Ben Hung, Anchor  
Pradeep Mugunthan, Anchor  
John Renda, Anchor  
Michael Riley, Anchor  
Carl Stivers, Anchor  
Rob Ede, Hahn & Associates  
James Peale, Maul Foster Alongi  
Sean Sheldrake, EPA  
Rich Muza, EPA  
Lance Peterson, CDM Smith  
Scott Coffey, CDM Smith  
Keith Johnson, NWR/Cleanup Section  
Tom Gainer, NWR/Cleanup Section  
Henning Larsen, NWR/Cleanup & Tanks Section  
ECSI No. 84 File  
ECSI No. 183 File